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May 10, 2022

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

RE: United States v. Michael Avenatti,
19 Cr. 374 (JMF)

Dear Judge Furman:

We write to renew the defense's request for a remote sentencing hearing in the above-captioned case. On Friday, May 6, 2022, the parties learned that Michael Avenatti's California retrial has been scheduled for July 5, 2022. Mr. Avenatti's sentencing in this case is scheduled for June 2, 2022. To minimize the likelihood of any conflict between the California trial, Mr. Avenatti's need to prepare for it, and Mr. Avenatti's sentencing in the instant case, the defense respectfully renews its request for Mr. Avenatti's sentencing proceeding to occur by videoconference. The Government provided its position as follows: "In light of the trial date of July 5, 2022, set by the United States District Court for the Central District of California, the Government consents to the application for sentencing to proceed remotely."

Respectfully Submitted,

/s/
Robert M. Baum
Tamara L. Giwa
Andrew J. Dalack
Assistant Federal Defenders

Cc: Government Counsel

Counsel for Michael Avenatti